SUMMARY REPORT
ON THE
ASBESTOS ASSESSMENT SURVEY
OF ZINC LADEN DUST
AT THE
BUNKER HILL
ROASTER FLOOR BUILDING AND ROASTER BUILDING NUMBER 5
KELLOGG, IDAHO

Project Number: A94-013

March 7, 1994

PREPARED FOR:

Pintlar Corporation P.O. Box 480 Kellogg, Idaho

Prepared by

MCS Environmental 2104 Reserve Street Missoula, Montana 59801

PINTLAR CORPORATION

1005 W. McKinley P.O. Box 480 Kellogg, Idaho 83837 (208) 784-1321 Fax (208) 783-6621

M----- 0 100/

March 9, 1994

Ms. Rebecca Goehring U.S. EPA 422 W. Washington St. Boise, Idaho 83702

Re: Bunker Hill Superfund Site - Sampling Results for Roaster Areas and Revised Letter Plan

Dear Ms. Goehring:

Enclosed please find one copy of the results from the February 23 and 24, 1994 sampling of the roaster areas. My letter to you dated March 7 mistakenly referenced a March 2 sampling. I apologize for any confusion this may have caused. This letter also contains other changes from the earlier letter and so this correspondence should supersede the March 2 correspondence.

These areas were sampled using protocols, we felt were appropriate to the situation, by AHERA certified inspectors (MCS Environmental). The samples were analyzed at an NAV accredited laboratory. The results indicate that 3 sections of the elevated floors of the #5 Roaster Building and 5 sections from the Roaster Floor levels contain at least a trace of asbestos. The other sections, 30 in all, show non-detectable levels of asbestos.

Based upon your letter to me dated March 9, we will not be collecting zinc materials from inside the roaster buildings until we have evaluated the options you have given us and we determine which is the best way to go forward.

Sincerely,

Antonio J. Chavezo

Vice President - Engineering

encl.

cc:

(w/encl.)

Nick Ceto

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March 7, 1994

Mr. Jim Hodge Pintlar Corporation P.O. Box 480 Kellogg, Idaho 83837 MAR 1 0 1994
SUPERFUND DEMEDIAL BRANCH

Dear Mr. Hodge:

MCS Environmental is pleased to provide you with this report for the limited Asbestos Assessment Survey of the accumulated dust and debris within the Roaster Floor Building and Roaster Building #5, Bunker Hill Complex, Kellogg, Idaho.

The Asbestos Assessment Survey included visual assessment of dusts/debris, bulk sampling, Polarized Light Microscopy/Dispersion Staining (PLM/DS) analysis, and review of existing blue prints and building specifications. Asbestos contaminated dusts and debris were identified within the Roaster Floor Building and the Roaster Building #5. Sample Areas within the Roaster Floor Building identified as having trace amounts or greater of asbestos include the following: Level 1, SA4; Level 2, SA4, SA5; Level 4, SA2, SA3, SA5.

Sample Areas within the Roaster Building #5 identified as having trace amounts or greater of asbestos include the following: Level 2, SA2, SA3; Level 4, SA2.

If you have any questions, or require any clarification concerning this report, please contact me or Mr. Wade Johnston at (800) 735-7095. It was a pleasure working with you and your organization, and we look forward to working with you again in the future.

Sincerely,

Ronald A. Knutson Industrial Hygienist

Rouglo A. Kaylan

RAK/ews Enclosure

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EXECUTIVE SUMMARY

MCS Environmental was contracted by Mr. Jim Hodge of the Pintlar Corporation, Kellogg, Idaho to conduct a limited Asbestos Assessment of zinc laden dusts/debris of the Roaster Floor Building and the Roaster Building #5, Bunker Hill Superfund Site, Kellogg, Idaho.

The limited Asbestos Assessment of dusts/debris at this location was conducted on February 23 and 24, 1994 by Mr. Ronald A. Knutson, Accredited Asbestos Inspector (Certification # MTA0964). The project scope included a visual assessment, bulk sampling, PLM/DS analysis, and review of existing blue prints and building specifications.

Based on our professional experience and expertise in environmental affairs, along with information and data gathered from the limited Asbestos Assessment, it is our qualified professional opinion that there are asbestos contaminated dusts/debris present in the Roaster Floor Building and the Roaster Building #5, Bunker Hill Superfund Site, Kellogg, Idaho.

Asbestos contaminated dusts and debris were identified within the Roaster Floor Building and the Roaster Building #5. Sample Areas within the Roaster Floor Building identified as having trace amounts or greater of asbestos include the following: Level 1, SA4; Level 2, SA4, SA5; Level 4, SA2, SA3, SA5.

Sample Areas within the Roaster Building #5 identified as having trace amounts or greater of asbestos include the following: Level 2, SA2, SA3; Level 4, SA2.

Our survey findings and related report conclusions are based on information obtained from our site observations and supporting laboratory analysis. The findings and conclusions presented here are not to be construed as legal advice.

Detailed conclusions and recommendations specific to this site and our investigation are provided in Sections 4.0 and 5.0, respectively of this assessment report.

1.0 INTRODUCTION

MCS Environmental was contacted by Mr. Jim Hodge of Pintlar Corporation, Kellogg, Idaho, to conduct a limited Asbestos Assessment Survey of the accumulated dust within the Roaster Floor Building and Roaster Building #5, Bunker Hill Complex, Kellogg, Idaho. The inspection area included approximately 56,000 square feet in the Roaster Floor Building and 50,000 square feet in the Roaster Building #5. The roaster buildings are abandoned, multi-story industrial ore processing facilities. Zinc laden dust, related to previous processing has accumulated on most horizontal surfaces in the building. Pintlar Corporation desires to recover the zinc dust for shipment and additional processing.

The survey of this location was conducted on February 23 and 24, 1994 by Mr. Ron A. Knutson, Accredited Asbestos Inspector (Certification # MTA0964)., MCS Environmental, Missoula, Montana.

2.0 OBJECTIVE

The purpose of the project was to conduct a limited Asbestos Assessment Survey on the accumulated dust in the above mentioned buildings. The project included development of a sampling plan to delineate areas where dust did and did not contain asbestos, limited bulk sampling of dust, and laboratory analysis using Polarized Light Microscopy/Dispersion Staining (PLM/DS).

Pursuant to EPA National Emissions Standards for Hazardous Air Pollutants (NESHAP's), all Regulated Asbestos Containing Materials (RACM's) and Category II Non-Friable ACM's must be removed prior to any demolition which would affect these materials. However, the EPA requires the assessment of all ACM's within a facility prior to demolition, even though only RACM's and Category II ACM's need to be removed.

This phase of work focused strictly on the assessment of dusts and debris within the Roaster Floor Building and the Roaster Building #5. It did not include sampling and analysis of suspect ACBM's within the buildings.

Following is a list of tasks included in the limited Asbestos Assessment Survey of dust/debris:

- Development of a representative dust sampling plan
- Sampling of accumulated zinc dust in the Roaster Floor Building and Roaster Building #5.
- Laboratory analysis of samples using PLM/DS.
- Preparation of an Inspection Report summarizing and delineating areas in the buildings where dust/debris are impacted by asbestos.

3.0 ASSESSMENT SURVEY PARAMETERS

3.1 Dust Sampling Plan

Pintlar Corporation desires to remove and recover accumulated zinc dusts and debris located within the Roaster Floor Building and Roaster Building #5 which no detectable amounts of asbestos by volume as determined using PLM/DS. Assessment survey parameters were developed to maximize sample coverage yet provide a degree of sensitivity necessary to characterize each floor.

3.2 Sampling Grid Discretization

3.2.1 Roaster Floor Building

Four, 14,000 square foot levels on the Roaster Floor Building were sampled to identify asbestos contaminated dust/debris. The levels are identified as Level 1-4, from the bottom to the top **excluding** the basement level. Each level was sectioned into 20 x 7 or 140 total grid nodes. Each grid node was 100 square feet in size.

Each floor was further divided into five (5) Sampling Areas which contained 4 x 7 or 28 total grid nodes. Horizontal surfaces within 10 random grid nodes which contained dusts and debris were sampled within the Sample Area. Suspect ACM's within the grid nodes were noted and assumed to be contaminated within a 3 foot distance of the suspect ACM. Sample results are reported by Sample Area and are representative of an area approximately 2800 square foot in size. A schematic of the Sampling Areas, grid spacing and grids sampled are included in Appendix A. Sample location notes are attached in Appendix B.

3.2.2 Roaster Building #5

Five, 9,000 square foot levels, and one 4,500 square foot level on the Roaster Building #5 were sampled to identify asbestos contaminated dust/debris. The levels are identified as Level 1-6, from the bottom to the top **including** the basement level. Each 9,000 square foot level was sectioned into 18 x 5 or 90 total grid nodes. The 4,500 square foot level was sectioned into 9 x 5 or 45 total grid nodes. Each grid node was 100 square feet in size.

Each 9,000 square foot level was further divided into four (4) Sampling Areas. The four sampling areas for the 9,000 square foot levels each contained 5×5 (25) and/or 4×5 (20) total grid nodes. Sample results are reported by Sample Area and are representative of an area approximately 2250 to 2500 square foot in size.

The 4,500 square foot level was divided into two (2) sampling areas. The two sampling areas for the 4,500 square foot levels each contained 4 x 5 (20) or 5 x 5 (25) total grid nodes. Sample results are reported by Sample Area and are representative of an area approximately 2000 to 2500 square foot in size.

Horizontal surfaces within 10 random grid nodes which contained dusts and debris were sampled

within the Sample Area. Suspect ACM's within the grid nodes were noted and assumed to be contaminated within a 3 foot distance of the suspect ACM.

The first level (basement) contained four piles of zinc laden dust/debris. Grid sampling was not performed on the first level of the Roaster Building #5. However, bulk samples were obtained from each dust/debris pile. A schematic of the Sampling Areas, grid spacing and grids sampled are included in Appendix A. Sample location notes are attached in Appendix B.

3.3 SAMPLING PROTOCOL

A sampling protocol was developed which would maximize sample coverage yet provide some degree of sensitivity necessary to characterize each floor.

A one hundred cubic centimeter dust sample was obtained from ten random grid nodes within each Sample Area. The ten samples were composited and homogenized in a stainless steel bowl, and a one half cup representative grab sample from the composited and homogenized group was placed in a labeled, sealable, zip-loc baggy.

Sample grids which were visibly occupied by suspect ACM's were not included in the sampling area. Grid nodes containing suspect ACM's in a portion of the grid node were included within the Sampling Area. However, dust samples were not obtained within three feet of any visually identified suspect ACM's. This sampling procedure allows for space maximization under the existing project constraints. A detail of areas that were sampled and or excluded because of the presence of visible ACM's is attached in Appendix C.

A number of grid nodes within the Sample Area did not contain any horizontal sample space due to building and floor design (open spaces, grating, etc.). Note: All visually identified ACM's have been given a 3 foot zone of assumed contamination.

3.4 Laboratory/Analytical

Forty-two (42) samples of zinc laden dust/debris were composited from a total of 420 samples obtained from the Roaster Floor Building and Roaster Building #5 in conjunction with this zinc dust/Asbestos Assessment Survey.

The samples were submitted to Mountain Laboratories on February 24, 1993 for analysis. Mountain Laboratories participates in the National Voluntary Laboratory Accreditation Program (NVLAP) for Bulk Asbestos Analysis, governed by the National Institute for Standards and Technology (NIST) - NVLAP I.D. #1890. Sample analysis was performed to determine asbestos type and content using Polarized Light Microscopy, supplemented by Dispersion Staining (PLM/DS) in accordance with the following methodologies:

USEPA "Interim Method for the Dispersion of Asbestos in Bulk Insulation Samples",(40 CFR Part 763, Subpart F, Appendix A, May 27, 1982);

ASTM Draft "Standard Method for Asbestos Containing Materials by Polarized Light Microscopy", (Committee D22.05, January 14, 1988).

3.5 Quality Assurance / Quality Control

The quality assurance/quality control(QA/QC) program of Mountain Laboratories is comprised of three primary elements: in-house or proprietary quality control, inter-laboratory quality control with non-affiliated laboratories, and the publicly available and sponsored quality assurance programs.

The proprietary quality control program is the most rigorous of the three aspects of quality control employed:

- a. Periodic QC is performed at a minimum rate of 10% of all analyses performed. With this type of QC, the sample is re-analyzed and results compared with the original analysis. Any corrections or adjustments are agreed upon or presided over by the senior analyst. 10% QA/QC has been completed and is within acceptable levels for the samples submitted to Mountain Laboratories for analysis from the Roaster Floor Building and Roaster Building #5.
- b. When an analyst is uncertain about any part of an analysis or needs another opinion, a "voluntary" analysis is employed, in which any number of analysts compare results and confer until a consensus is reached.
- c. Any adjustments or corrections to analyses are made by the senior analyst. All Quality Control analyses are recorded in the ALAS system and the QC analyst signs or initials the analysis sheet.
- d. With certain types of analyses--particularly air sample analyses--"blanks" are also analyzed to determine background levels of contamination inherent in the sampling and preparation methods. These values are statistically weighed and subtracted from analytical results to more accurately reflect the reality of the sampling situation.

Inter-laboratory QA/QC is performed via ground or air courier services that ship asbestos containing material. All participants are independent laboratories. With the inter-laboratory QC program, batches of samples are circulated between laboratories. The analysts in each laboratory analyze all the samples by their particular methods of analysis and the results from each laboratory are statistically compiled to determine the precision between laboratories.

For samples with known concentrations, the relative accuracy is also assessed statistically. For in-house purposes, the laboratory manager may also choose to delineate individual performances on a per-analyst basis.

The publicly available QA/QC programs, such as the Proficiency Analytical Testing administered by the American Industrial Hygiene Association (AIHA), the National Voluntary Laboratory Accreditation Program (NVLAP) administered by the National Institute of Standards and Technology, the Asbestos Analysis Registry an AIHA program are kept current in the QA/QC program, where applicable. The minimum requirements for each of these programs, and any other programs that apply, are incorporated as a starting point in the laboratory setting and are improved upon wherever possible.

3.6 Sample Processing

Mountain Laboratories utilizes a microcomputer for Chain of Custody Record to track all samples which are received at our facility. The Chain of Custody Record is initiated at the time the samples arrive at the lab and concluded when the data is archive in storage indefinitely and samples retained for a period of 6 months. The structure of the record is designed to be consistent with the requirements for maintaining a proficient status under NVLAP accreditation and the Code of Federal Regulations, 40 CFR Part 763 (AHERA Regulations), October 30, 1987.

Upon arrival of a sample package to Mountain Laboratories, the sample coordinator will initiate the required steps consistent with the Chain of Custody Record. Mountain Laboratories, using the ALAS system, assigns an I.D. Number to each individual sample, as well as a project number to each batch of samples it receives. These numbers are generated by the ALAS system and are marked on each sample. Mountain Laboratories identification system will be used to identify each sample uniquely and also serve as a cross reference to each clients I.D. system. After the logging system has been completed, the samples(s) will be sent to the appropriate department for processing.

The final results are stored in a data base developed by Mountain Laboratories professional staff. Final reports are generated, and the sorted data is saved in the data base and backed up on floppy disks.

4.0 CONCLUSIONS

Our assessment survey findings and related report conclusions are based on information obtained from our site observations and sample analysis. This assessment process yields conclusions that are used to judge the likelihood of significant asbestos-related issues existing that would adversely impact Pintlar Corporation regarding the recovery of zinc laden dust in these buildings. Relative to the Roaster Floor Building, Bunker Hill Complex, Kellogg, Idaho, the following observations and conclusions are recorded below. Sample results from the Roaster Floor Building and Roaster Building Number 5 are summarized below on Table I and Table II, respectively. Hard copies of the laboratory results are attached in Appendix D. Sample Areas containing trace or greater amounts of asbestos contamination are shown in Appendix E and Appendix C. Asbestos laboratory certifications and accreditation is attached in Appendix F.

Floor	Sample No.	Asbestos Content	Comments
901 (1) 91 · · ·	RFB-1-SA1	No Detectable	Zinc Dust
	RFB-1-SA2	No Detectable	CE 1% Zinc Dust
	RFB-1-SA3	No Detectable	CE 1% Zinc Dust
1	RFB-1-SA4	CH 2% AM 2%	GL 1% Zinc Dust
	RFB-1-SA5	No Detectable	Zinc Dust
	RFB-2-SA1	No Detectable	CE 1% Zinc Dust
	RFB-2-SA2	No Detectable	Zinc Dust
	RFB-2-SA3	No Detectable	CE 2% Zinc Dust
2	RFB-2-SA4	Trace CH	CE 1% Zinc Dust
	RFB-2-SA5	CH 2%	Zinc Dust
	RFB-3-SA1	No Detectable	CE 1% Zinc Dust
	RFB-3-SA2	No Detectable	CE 1% Zinc Dust
	RFB-3-SA3	No Detectable	CE 1% Zinc Dust
3	RFB-3-SA4	No Detectable	CE 1% Zinc Dust
	RFB-3-SA5	No Detectable	Zinc Dust
	RFB-4-SA1	No Detectable	CE 1% Zinc Dust
	RFB-4-SA2	Trace CH	CE 1% Zinc Dust
	RFB-4-SA3	CH 2%	Zinc Dust
4	RFB-4-SA4	No Detectable	Zinc Dust
	RFB-4-SA5	Trace CH	Zinc Dust

CE - Cellulose CH - Chrysotile CR - Crocidolite GL - Fibrous Glass AM - Amosite

Zinc Dust Sample Results: Roaster Building #5				
Floor	Sample No.	Asbestos Content	Comments	
	RB5-P1	No Detectable	Zinc Dust	
	RF5-P2	No Detectable	Zinc Dust	
	RB5-P3	No Detectable	Zinc Dust	
1	RB5-P4	No Detectable	Zinc Dust	
	RB5-2-SA1	No Detectable	Zinc Dust	
	RB5-2-SA2	CR 2%	Zinc Dust	
	RB5-2-SA3	Trace CH	Zinc Dust	
2	RB5-2-SA4	No Detectable	Zinc Dust	
	RFB-3-SA1	No Detectable	Zinc Dust	
	RFB-3-SA2	No Detectable	Zinc Dust	
	RFB-3-SA3	No Detectable	Zinc Dust	
. 3	RFB-3-SA4	No Detectable	Zinc Dust	
	RFB-4-SA1	No Detectable	Zinc Dust	
	RFB-4-SA2	Trace CH	Zinc Dust	
	RFB-4-SA3	No Detectable	Zinc Dust	
4	RFB-4-SA4	No Detectable	CE 1% Zinc Dust	
	RFB-5-SA1	No Detectable	Zinc Dust	
	RFB-5-SA2	No Detectable	Zinc Dust	
5	RFB-5-SA3	No Detectable	Zinc Dust	
	RFB-5-SA4	No Detectable	CE 1% Zinc Dus	
	RFB-6-SA1	No Detectable	Zinc Dust	
6	RFB-6-SA2	No Detectable	Zinc Dust	

CE - Cellulose CH - Chrysotile CR - Crocidolite GL - Fibrous Glass AM - Amosite

5.0 RECOMMENDATIONS

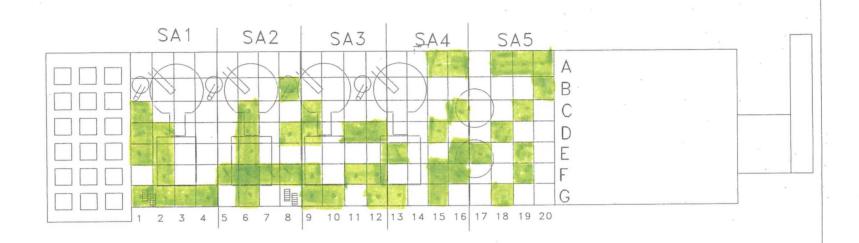
Consistent with our knowledge and understanding of environmental regulations, particularly as they apply to the potential liabilities associated with the presence of Asbestos Containing Building Materials in industrial facilities, relative to the Roaster Floor Building and the Roaster Building #5, Bunker Hill Superfund Site, Kellogg, Idaho, the following recommendations are made:

- Sample Areas which contain trace amounts or greater of asbestos may require additional sampling and analysis to further define the extent of contamination. PLM analysis for these areas should be analyzed by PLM/DS with supplemental point counting analytical procedures for greater sensitivity.
- In addition to the Sample Areas identified above, which contain trace amounts or greater of asbestos, any and all areas within the Roaster Floor Building and Roaster Building #5, in which zinc dust/debris removal work shall take place, must to be visually assessed for suspect ACM's. Areas identified as containing suspect ACM's should be given a minimum three (3) foot buffer around the suspect ACM in which materials/dusts/debris may not be disturbed. In addition, an OSHA Asbestos Competent Person or an Accredited Asbestos Inspector should be present during the VAC loader clean up, to visually identify suspect ACM's.
- Pursuant to EPA National Emissions Standards for Hazardous Air Pollutants (NESHAP's), all Regulated Asbestos Containing Materials (RACM's) and Category II Non-Friable ACBM's must be removed prior to any renovation/demolition which would affect these materials. However, the EPA requires the assessment of all ACM's within a facility prior to renovation/demolition, even though only RACM's and Category II ACBM's need to be removed. Therefore, ACBM's within the facilities should be sampled, identified, and assessed. In addition, should access to vessels/roasters be required as a portion of the zinc dust/debris recovery impacted ACBM's and asbestos contaminated dust/debris within the affected areas must be abated prior to disturbance.

These findings and recommendations made herein are not to be construed as legal advice.

APPENDIX A

SAMPLE LOCATION DIAGRAM
ROASTER FLOOR BUILDING & ROASTER BUILDING #5
BUNKER HILL SUPERFUND SITE, KELLOGG, IDAHO

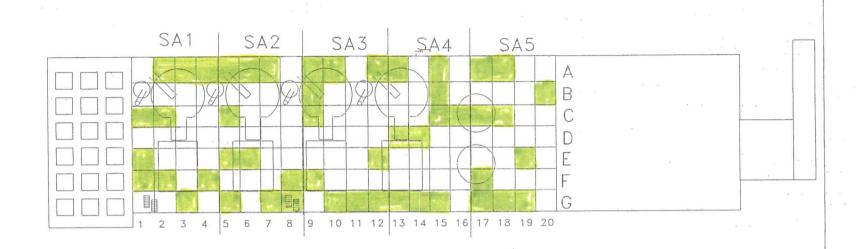




Sampled Grid

MCS Environmental
Roaster Floor Bldg. #9
Bunker Hill Superfund Site
MCS Job No: Date By: BLR
A94-001 1/7/94

Page __ of __ FLOOR #1





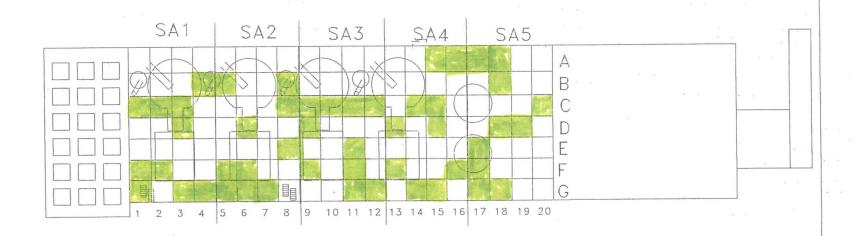
Sampled Grid

MCS Environmental

Roaster Floor Bldg. #9

Bunker Hill Superfund Site

MCS Job No: Date By: BLR A94-001 1/7/94 FLOOR #2

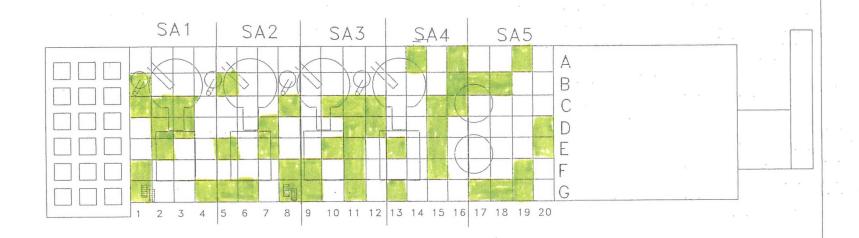




Sampled Grid

MCS Environmental
Roaster Floor Bldg. #9
Bunker Hill Superfund Site
MCS Job No: Date By: BLR
A94-001 1/7/94

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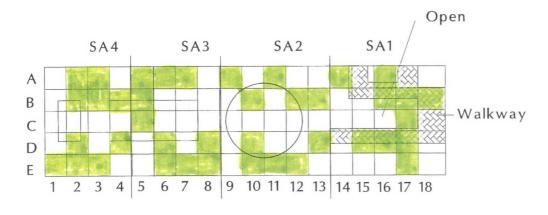




Sampled Grid

MCS Environmental Roaster Floor Bldg. #9 Bunker Hill Superfund Site

MCS Job No: By: BLR Date 1/7/94 A94-001 FLOOR #4



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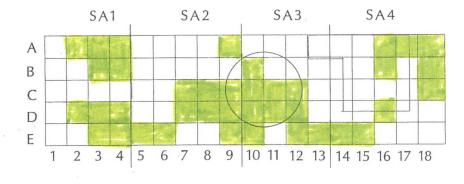


Sampled Grid

MCS Environmental
Roaster Bldg. #5
Bunker Hill Superfund Site
MCS Job No: Date By: BLR

A94-001 3/3/94

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Sampled Grid

MCS Environmental

Roaster Bldg. #5

Bunker Hill Superfund Site

MCS Job No:

Date

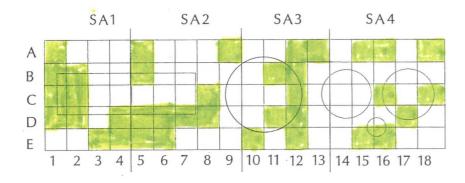
By: BLR

A94-001

3/3/94

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FLOOR #3



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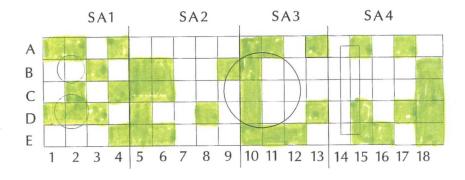


Sampled Grid

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MCS Environmental
Roaster Bldg. #5
Bunker Hill Superfund Site
MCS Job No: Date By: BLR
A94-001 3/3/94

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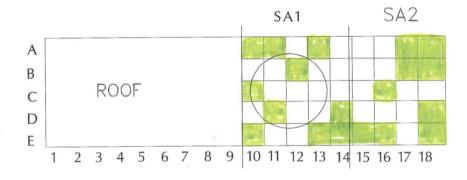
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Sampled Grid

MCS Env	ironm	ental
Roaster Bldg	. #5	
Bunker Hill Super	fund Site	
MCS Job No:	Date	By: BLR
494-001	3/3/94	
Page of	FLOOR	#5



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LEGEND



Sampled Grid

MCS Environmental
Roaster Bldg. #5
Bunker Hill Superfund Site
MCS Job No: Date
A94-001 3/3/94

Page __ of __ FLOOR #6

APPENDIX B

SAMPLE LOCATION NOTES
ROASTER FLOOR BUILDING & ROASTER BUILDING #5,
BUNKER HILL SUPERFUND SITE, KELLOGG, IDAHO

Roaster Floor Building Sample Location Notes

Sample Area	Sample Number	Description
	G1	Floor
	G2	Floor
	G3	Floor
	G4	Floor
Floor 1/SA1	F2	Beam 2ft
F100F 1/5A1	E2	Beam 2ft
	D2	Floor
	D1	Hand Railing
	E1	Floor
J	C1	Floor
	F5	Floor
	F7	Floor
Floor 1/SA2	F8	Railing 2ft
	D6	Railing 2ft
	C6	Floor
	D8	Railing
	В8	Floor
	E7	Overhead Girder
	F7	Overhead Girder
	G6	Floor

	F12	Railing 2ft
	F11	Overhead Girder
	D11	Overhead Girder
	D12	Floor
	G10	Floor
	F9	Railing 2ft
Floor 1/SA3	G9	Floor
	D9	Railing 2ft
in the	C9	floor
	G12	Floor
	G13	Floor
	E13	Overhead Girder
	G15	Floor
	F15	Railing
	D15	Overhead Girder
	A15	Floor
	A16	Floor
Floor 1/SA4	C16	Table
	F16	Floor
	E16	Floor

	G18	Railing
	F19	Floor
	E19	Floor
	E17	Floor
	D18	Floor
	C19	Floor
	A19	Stair Handrail
	A18	Floor
Floor 1/SA5	A20	Floor
	B20	Floor
	A2	Floor
	C2	Floor
	E1	Floor
	C1	Transformer Top
	F2	Overhead Girder
Floor 2/SA1	G3	Floor
	F4	Railing
	A4	Floor
	A3	Floor
	F1	Railing
	G5	Table Top
	E5	Floor
	A5	Floor
	A6	Floor
	A7	Floor
	F8	Floor
	G8	Floor
Floor 2/SA2	G7	Floor
	E6	Overhead Railing

	C5	Overhead Pipe
	F9	Overhead Railing
	C9	Floor
	В9	Hand Railing
	A9	Floor
	A10	Floor
	A12	Floor
Floor 2/SA3	G12	Floor
F1001 2/5A5	F11	Hand Rail
	G11	Hand Rail
	G10	Transformer Top
	G13	Floor
	D13	Floor
	A13	Hand Rail
	A15	Electric Box, Top
	C15	floor
	B15	Railing
	G15	Floor
Floor 2/SA4	G14	Floor
	D14	Pipe Top
	C16	Floor
The second secon	A17	Floor
	A18	Floor
	B20	Floor
	C18	Floor
	E19	Floor
	G19	Floor
	G18	Floor
Floor 2/SA5	G17	Floor

	F17	Cabinet Top
	C17	Floor
	G1	Floor
	F1	Overhead Beam
	C1	Railing
	C2	Floor
	C3	Overhead Beam
Floor 3/SA1	D3	Overhead Beam
	B4	Floor
	G4	Railing
	G3	floor
	F2	Floor
	G5	Railing
	F5	Overhead Beam
	B5	Overhead Pipe
	D6	Railing
	C8	Overhead Beam
	E8	Overhead Beam
Floor 3/SA2	В8	Floor
	G7	Floor
	G6	Floor
	F6	Floor
	D9	Stair
46	С9	Overhead Beam
	C10	Overhead Beam
	C11	Railing
	C12	Overhead Beam
Floor 3/SA3	G12	Stair
	G11	floor

	F11	Overhead Beam
	F9	Overhead Beam
	E11	Floor
	D13	Overhead Beam
	F13	Overhead Beam
	G14	Railing
	G15	floor
	A16	Floor
Floor 3/SA4	A15	Floor
	C14	Railing
	C15	Overhead Beam
	F16	Overhead Beam
	D15	Overhead Beam
	A17	floor
	A18	Floor
	B18	Floor
	C20	Floor
	D19	Floor
	G18	Floor
Floor 3/SA5	G17	Railing
	F17	Overhead Beam
	E17	Overhead Beam
	D18	Overhead Beam

	G1	Railing
	F1	Floor
	E2	Floor
	D2	Floor
	C1	Floor
	C2	Stair
Floor 4/SA1	B1	floor
	G4	Railing
	D4	Conveyor Top
	C4	Conveyor Top
	G5	Floor
	E5	Floor
	В5	Stair (2nd)
	G6	Floor
	G8	Pipe
	F7 ·	Conveyor Motor
Floor 4/SA2	E7	Conveyor Belt
	D7	floor
	C8	Stair (2nd)
	F8	Stair (4th)
V 1 A	F9	Floor
	G9	Floor
	E10	Floor
**	C10	Stair
	G11	Floor
Floor 4/SA3	F11	Overhead Beam
	E11	Conveyor Motor
	D12	Conveyor Belt
	C11	Conveyor Belt

	C12	Stair (2nd)
	G13	Railing
	E13	floor
	C15	Stair
	F15	Railing
	E15	Floor
	D15	floor
Floor 4/SA4	C16	Railing
	B16	Floor
	A16	Floor
	A14	floor
	G17	Floor
	G18	Floor
	G19	Floor
	F19	Railing
	E20	Floor
Floor 4/SA5	D20	Floor
	A19	Floor
	B18	Railing
	韓 B17	Floor
	C17	Floor

Roaster Building Number 5 Sample Location Notes

Floor/Sample Area	Sample Number	Description
	E17	Floor
	D17	Floor
	C17	Floor
	B17	Floor
	B18	Floor
	A16	Floor
Floor2/SA1	B16	Floor
	A14	Floor
	D15	Floor
	D16	Floor
	E12	Rail
Floor 2/SA2	D13	Rail
	E11	Floor
	D10	Floor
	E10	Rail
	A9	Rail
	B10	Floor
	A11	Floor
	B12	Floor
	B13	Floor

	E8	Rail
	D8	Rail
	E6	Rail
	D6	Floor
	E7	Floor
Floor 2/SA3	A7	Rail
	B5	Rail
	C5	Floor
	A5	Floor
	A6	Floor
	E1	Rail
	E2	Rail
	E3	Rail
	D4	Floor
	D2	Floor
	B2	Rail
Floor2/SA4	A3	Rail
	В3	Floor
	B4	Floor
	A2	Floor
	A2	Rail
	В3	Rail
Floor3/SA1	B4	Rail
	A4	Rail
	A3	Rail
	D2	Rail
	D3	Rail
	D4	Rail
	E4	Rail

	E3	Rail
	E5	Floor
	E6	Floor
	D7	Rail
	D8	Rail
	C8	Floor
	D9	Floor
	C7	Floor
Floor 3/SA2	E9	Floor
	C9	Floor
	A9	Floor
	E10	
	D10	Floor
	C11	Floor
	B10	Floor
Floor 3/SA3	C10	Floor
	E12	Floor
	D11	Floor
	C10	Floor
	C12	Floor
	D12	Floor
	E13	Rail
	E14	Rail
	E15	Rail
	B18	Rail
	C18	Rail
	A17	Rail
Floor 3/SA4	A18	Rail

	A16	Rail
	B16	Rail
	D16	Rail
	A1	Floor .
	B2	Floor
	C1	floor
	B1	Floor
	C2	Floor
7/0.4.1	D4	Floor
Floor 4/SA1	E3	Floor
	D2	Floor
	D1	Floor
	E4	Floor
	D5	Floor
	E6	Floor
*	D6	Floor
	E5	Floor
	D7	Floor
	D8	Floor
Floor 4/SA2	C8	Floor
	A9	Floor
	A5	Floor
	B5	Floor

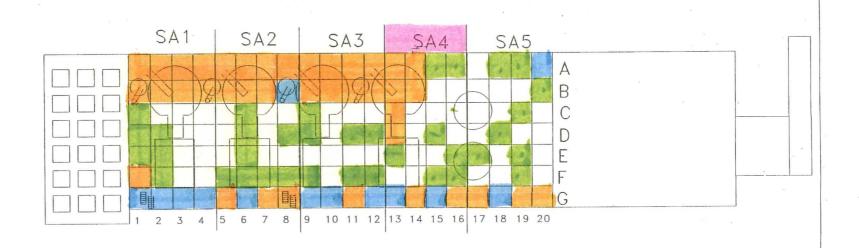
	E10	Floor
	D11	Floor
	E12	Floor
	D12	Floor
	B12	Floor
	A13	Floor
Floor 4/SA3	A12	Floor
	B12	Floor
	C12	Floor
	B11	Floor
	E15	Floor
	E16	Floor
	D17	Floor
	C16	Floor
	A16	Floor
	A15	Floor
Floor 4/SA4	C16	Floor
	C18	Floor
	D17	Floor
	A18	Floor
2	D1	Floor
	D3	Floor
	D2	Floor
	C2	floor
	В3	Floor
	A2	Floor
Floor 5/SA1	A1	Floor
11001 5/5/11	A4	Floor
	C4	Floor

	E4	Floor
	E5	Floor
	D5	Floor
	C5	Floor
	A5	Floor
	В6	Floor
	C6	floor
Floor 5/SA2	E6	Floor
	D8	Floor
	C9	Floor
	В9	Floor
	A10	Floor
	C10	Floor
× 10	E10	Floor
	E11	Floor
*	E12	Floor
	D13	Floor
Floor 5/SA3	A13	Floor
	A11	Floor
	B10	Floor
	D10	Floor
	E15	Floor
	D15	Floor
	E16	Floor
	D17	Floor
	E18	Floor
	D18	Floor
Floor 5/SA4	C18	Floor
	B18	Floor

	A17	Floor
	B15	Floor
	E10	Floor
	C10	Floor
	A10	Floor
-	A11	Floor
	B12	Pipe
	A13	Floor
Floor 6/SA1	D14	Floor
11001 0/5/11	F14	Floor
	F13	Floor
	D11	Floor
	E15	Floor
	E16	Floor
* , · · · · · · · · · · · · · · · · · ·	E18	Floor
	D18	Floor
	B18	Floor
Floor 6/SA2	A18	Floor
	B17	Floor
	A17	Floor
	C17	Floor
	C16	Floor

APPENDIX C

SAMPLE AREA DETAIL DIAGRAM ROASTER FLOOR BUILDING & ROASTER BUILDING #5 BUNKER HILL SUPERFUND SITE, KELLOGG, IDAHO



SAI

Sample Area with Trace or Greater Asbestos Detected



No Sample Obtained, Grid Contained Suspect ACM

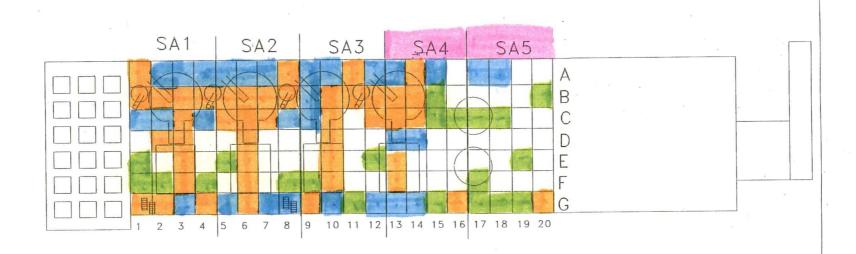


Sample Obtained 3 feet from ACM



Sampled Grid

MCS Environmental
Roaster Floor Bldg. #9
Bunker Hill Superfund Site
MCS Job No: Date By: BLR
A94-001 1/7/94



SA1

Sample Area with Trace or Greater Asbestos Detected



No Sample Obtained, Grid Contained Suspect ACM



Sample Obtained 3 feet from ACM



Sampled Grid

MCS Environmental

Roaster Floor Bldg. #9

Bunker Hill Superfund Site

MCS Job No:

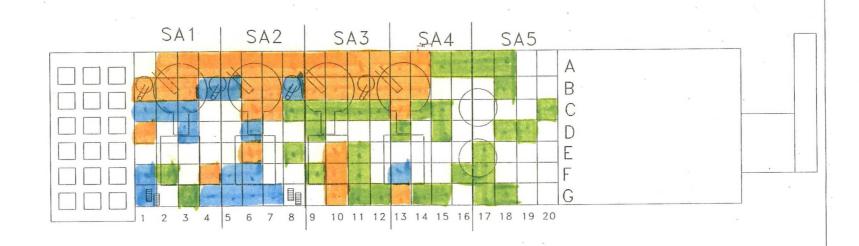
Date By: BLR

A94-001

1/7/94

Page __

FLOOR #2





Sample Area with Trace or Greater Asbestos Detected



No Sample Obtained, Grid Contained Suspect ACM



Sample Obtained 3 feet from ACM

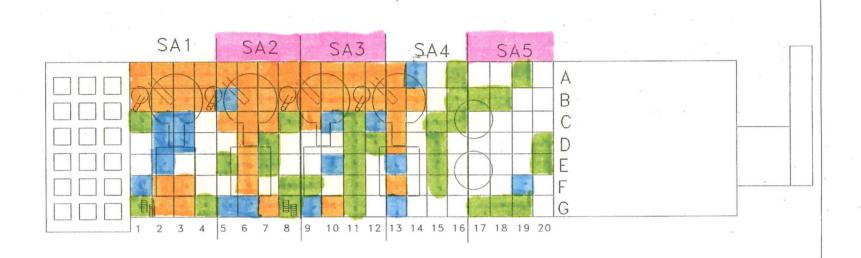


Sampled Grid

Roaster Floor Bldg. #9 Bunker Hill Superfund Site MCS Job No: Date By: BLR

MCS Job No: Date By: BLR 1/7/94

Page of FLOOR #3



SA1

Sample Area with Trace or Greater Asbestos Detected



No Sample Obtained, Grid Contained Suspect ACM



Sample Obtained 3 feet from ACM



Sampled Grid

MCS Environmental

Roaster Floor Bldg. #9

Bunker Hill Superfund Site

MCS Job No:

Date

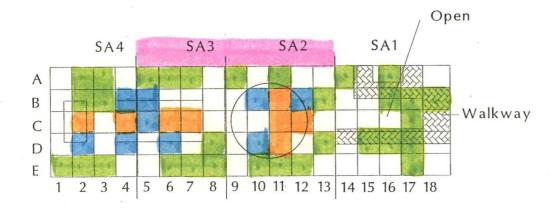
By: BLR

A94-001

1/7/94

Page __ o

FLOOR #4



LEGEND

SA1

Sample Area with Trace or Greater Asbestos Detected



No Sample Obtained, Grid Contained Suspect ACM



Sample Obtained 3 feet from ACM



Sampled Grid

MCS Environmental

Roaster Bldg. #5

Bunker Hill Superfund Site

MCS Job No: A94-001

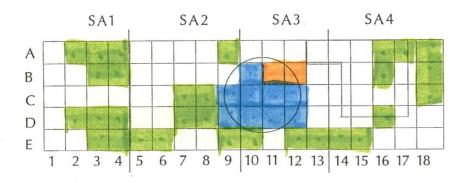
Date

By: BLR

3/3/94

Page __ of

FLOOR #2



LEGEND

SA1

Sample Area with Trace or Greater Asbestos Detected



No Sample Obtained, Grid Contained Suspect ACM



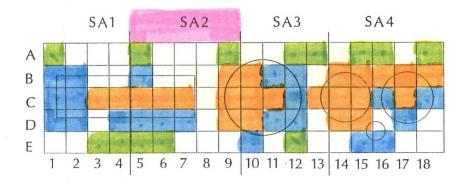
Sample Obtained 3 feet from ACM



Sampled Grid

 $\cdot \leftarrow N$

MCS Environmental Roaster Bldg. #5 Bunker Hill Superfund Site MCS Job No: Date By: BLR A94-001 3/3/94 Page __ of __ FLOOR #3



LEGEND

SA1

Sample Area with Trace or Greater Asbestos Detected



No Sample Obtained, Grid Contained Suspect ACM



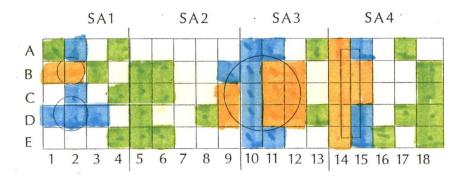
Sample Obtained 3 feet from ACM



Sampled Grid

 \leftarrow N-

MCS Environmental Roaster Bldg. #5 Bunker Hill Superfund Site MCS Job No: Date By: BLR A94-001 3/3/94 Page __ of __ FLOOR #4



LEGEND

SA1

Sample Area with Trace or Greater Asbestos Detected

No Sample Obtained, Grid Contained Suspect ACM



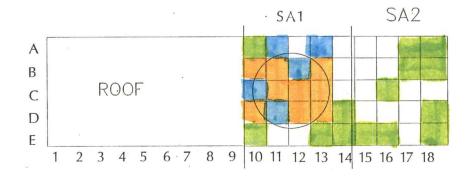
Sample Obtained 3 feet from ACM



Sampled Grid

MCS Environmental
Roaster Bldg. #5
Bunker Hill Superfund Site
MCS Job No: Date
A94-001 3/3/94

Page __ of __ FLOOR #5



LEGEND

SA1

Sample Area with Trace or Greater Asbestos Detected



No Sample Obtained, Grid Contained Suspect ACM



Sample Obtained 3 feet from ACM



Sampled Grid

 $\cdot \leftarrow N -$

MCS Environmental
Roaster Bldg. #5
Bunker Hill Superfund Site
MCS Job No: Date By: BLR
A94-001 3/3/94

Page __ of __ FLOOR #6

APPENDIX D

PETROGRAPHIC ANALYSIS SHEETS
ROASTER FLOOR BUILDING & ROASTER BUILDING #5
BUNKER HILL SUPERFUND SITE, KELLOGG, IDAHO

Project Title: RFB-1

Client: PINTLAR CORPORATION

	Sample No. Asbestos Content	Comments	
1).	B94-0228-004-01 No Detectable	SOIL	100%
	Client Id #: RFB-1-SA1		
2).	B94-0228-004-02 No Detectable	CE 1% SOIL	99%
	Client Id #: RFB-1-SA2		
3).	B94-0228-004-03 No Detectable	CE 1%	99%
_	Client Id #: RFB-1-SA3	20111	220
4),	B94-0228-004-04 CH 2% AM 2%	GL 1% SOIL	. 95%
	Client Id #: RFB-1-SA4	DOIL	. ,,,,
5).	B94-0228-004-05 No Detectable	COTI	100%
	Client Id #: RFB-1-SA5	SOIL	1000

oject Title: RFB-2

ient: PINTLAR CORPORATION

Sample No.	Asbestos Content	Comments	
B94-0228-006-01	No Detectable	CE 1%	99%
Client Id #: RFB-2	2-SA1	SOIL	236
B94-0228-006-02	No Detectable	0.77	1.000
Client Id #: RFB-2	2-SA2	SOIL	100%
B94-0228-006-03	No Detectable	CE 2% SOIL	98%
Client Id #: RFB-2	2-SA3	3011	200
B94-0228-006-04	Tra CH	CE 1%	0.00
Client Id #: RFB-2	2-SA4	SOIL	98%
B94-0228-006-05	CH 2%		
Client Id #: RFB-2	2-SA5	SOIL	98%

Project Title: RFB-3

Client: PINTLAR CORPORATION

	Sample No. Asbestos Content	Comments	
1).	B94-0228-005-01 No Detectable	CE 1% SOIL	99%
	Client Id #: RFB-3-SA1	5011	,,,,
2).	B94-0228-005-02 No Detectable	CE 1%	0.00
	Client Id #: RFB-3-SA2	SOIL	99%
) .	B94-0228-005-03 No Detectable	CE 1%	0.00
	Client Id #: RFB-3-SA3	SOIL	99%
) .	B94-0228-005-04 No Detectable	CE 1%	
	Client Id #: RFB-3-SA4	SOIL	 99%
).	B94-0228-005-05 No Detectable		
	Client Id #: RFB-3-SA5	SOIL	100%

Project Title: RFB-4

Client: PINTLAR CORPORATION

	Sample No.	Asbestos Content	Comments	
1.).	B94-0228-007-01	No Detectable	CE 1% ZINC DUST	99%
	Client Id #: RFB-4	4-SA1	ZINC DOSI	33%
2).	B94-0228-007-02	Tra CH	CE 1%	0.0%
	Client Id #: RFB-4	-SA2	ZINC DUST	98%
3).	B94-0228-007-03	CH 2%	GTNG DUGG	0.00
	Client Id #: RFB-4	-SA3	ZINC DUST	98%
4).	B94-0228-007-04	No Detectable	TIME DUE	1000
	Client Id #: RFB-4	-SA4	ZINC DUST	100%
5).	B94-0228-007-05	Tra CH	GING DUGG	0.00
	Client Id #: RFB-4	-SA5	ZINC DUST	99%

Project Title: RB5

Client: PINTLAR CORPORATION

	Sample No.	Asbestos Content	Comments	
1).	B94-0228-008-01	No Detectable	ZINC DUST	100%
	Client Id #: RB5-P1		ZINC DODI	1000
2).	B94-0228-008-02	No Detectable	ZINC DUST	100%
	Client Id #: RB5-P2		ZINC DOSI	100%
β).	B94-0228-008-03	No Detectable	ZINC DUST	100%
ı	Client Id #: RB5-P3		ZINC DOSI	100%
<u>1</u>) ,	B94-0228-008-04	No Detectable	ZINC DUST	100%
	Client Id #: RB5-P4		TIME DOST	T002

Project Title: RB5-2

Client: PINTLAR CORPORATION

	Sample No. Asbestos Conten	t	Comments	
1).	B94-0228-009-01 No Detectable		ZINC DUST	100%
	Client Id #: RB5-2-SA1			
2).	B94-0228-009-02 CR 2%		ZINC DUST	98%
	Client Id #: RB5-2-SA2		ZIIVO DODI	
3),	B94-0228-009-03 Tra CH		ZINC DUST	99%
	Client Id #: RB5-2-SA3			
4).	B94-0228-009-04 No Detectable Client Id #: RB5-2-SA4		ZINC DUST	 100%

Project Title: RB5-3

Client: PINTLAR CORPORATION

1	Sample No. Asbestos Content	Comments	
1).	B94-0301-002-01 No Detectable	ZINC DUST	100%
	Client Id #: RB5-3-SA1	ZINC DOSI	1000
2).	B94-0301-002-02 No Detectable	ZINC DUST	100%
	Client Id #: RB5-3-SA2	ZING DODI	2000
3).	B94-0301-002-03 No Detectable	ZINC DUST	100%
	Client Id #: RB5-3-SA3	2110 0001	2000
4).	B94-0301-002-04 No Detectable	CE 1% ZINC DUST	99%
· .	Client Id #: RB5-3-SA4	East who do \$ 50° day for the who	

Project Title: RB5-4

client: PINTLAR CORPORATION

	Sample No. Asbestos Content	Comments	
1).	B94-0301-001-01 No Detectable	ZINC DUST 1008	2
1	Client Id #: RB5-4-SA1	ZINC DOSI	Č.
2).	B94-0301-001-02 Tra CH	ZINC DUST 99%	
	Client Id #: RB5-4-SA2	, , , , ,	
().	B94-0301-001-03 No Detectable	ZINC DUST 1009	0/0
-	Client Id #: RB5-4-SA3		
) .	B94-0301-001-04 No Detectable	CE 1% ZINC DUST 99%	
	Client Id #: RB5-4-SA4	, ,	

Project Title: RB5-5,6

Client: PINTLAR CORPORATION

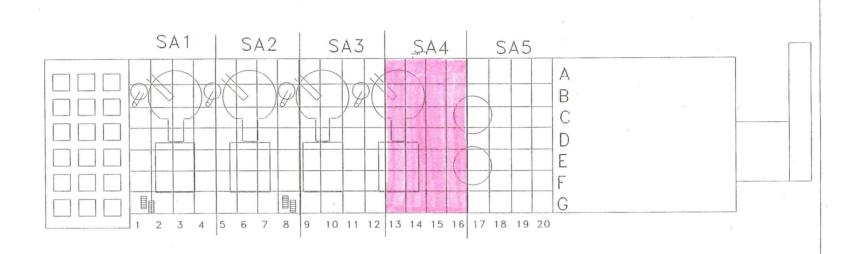
	Sample No. Asbestos Content	Comments	
1).	B94-0228-010-01 No Detectable	ZINC DUST	100%
	Client Id #: RB5-5-SA1	ZINC DOST	T00.9
2).	B94-0228-010-02 No Detectable	ZINC DUST	100%
	Client Id #: RB5-5-SA2	ZINC DODI	7000
3).	B94-0228-010-03 No Detectable	ZINC DUST	100%
	Client Id #: RB5-5-SA3	ZINC DODI	1000
4).	B94-0228-010-04 No Detectable	CE 1% ZINC DUST	99%
-	Client Id #: RB5-5-SA4	ZINO DODI	
5).	B94-0228-010-05 No Detectable	ZINC DUST	100%
	Client Id #: RB5-6-SA1		
5).	B94-0228-010-06 No Detectable	ZINC DUST	100%
	Client Id #: RB5-6-SA2		

APPENDIX E

SAMPLE AREAS WITH TRACE OR GREATER ASBESTOS DIAGRAM ROASTER FLOOR BUILDING & ROASTER BUILDING #5 BUNKER HILL SUPERFUND SITE, KELLOGG, IDAHO

APPENDIX E

SAMPLE AREAS WITH TRACE OR GREATER ASBESTOS DIAGRAM ROASTER FLOOR BUILDING & ROASTER BUILDING #5 BUNKER HILL SUPERFUND SITE, KELLOGG, IDAHO

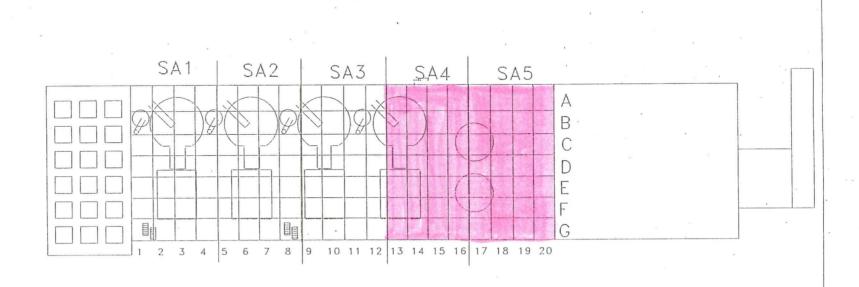


LEGEND SA1



Sample Area (SA#) With Composite Sample Containing Greater Than Trace Asbestos

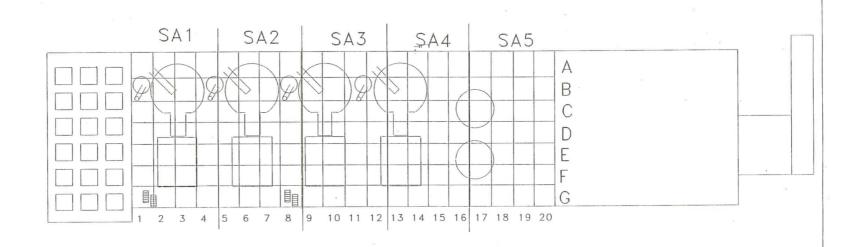
MCS Env	ironmen	tal		
Roaster Floo	r Bldg. #	9		
Bunker Hill Superfund Site				
MCS Job No: A94-001	Date By:	BLR		
A94-001	1/7/94			
Page of	FLOOR #1			





Sample Area (SA#) With Composite Sample Containing Greater Than Trace Asbestos

MCS Env	ironmental
Roaster Floo	
Bunker Hill Super	
MCS Job No:	Date By: BLR 1/7/94
494-001	1/7/94
Page of	FLOOR #2

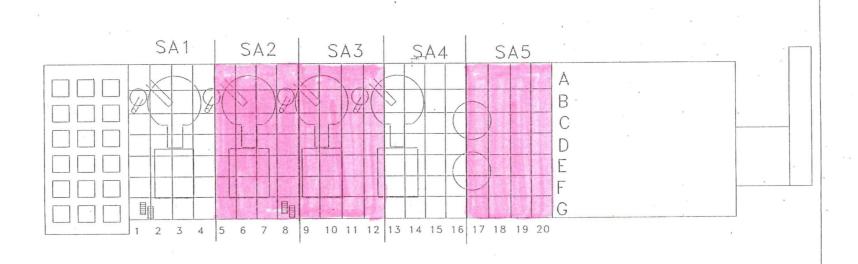


LEGEND SA1



Sample Area (SA#) With Composite Sample Containing Greater Than Trace Asbestos

MCS Env	ironmental
Roaster Floo	r Bldg. #9
Bunker Hill Super	fund Site
MCS Job No:	Date By: BLR
494-001	1/7/94
	FLOOR #3
Page of	



SA1

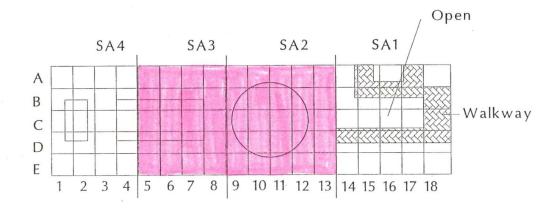


Sample Area (SA#) With Composite Sample Containing Greater Than Trace Asbestos

MCS	Envir	onm	enta
Roactor	Floor	Rlda	# Q

Roaster Floor Bldg. #9
Bunker Hill Superfund Site

MCS Job No: Date By: BLR A94-001 1/7/94



RB5 LEGEND

SA1



Sample Area (SA#) With Composite Sample Containing Greater Than Trace Asbestos

· ←N—

MCS Environmental

Roaster Bldg. #5

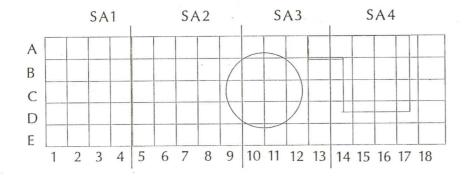
Bunker Hill Superfund Site

MCS Job No:

By: BLR Date

A94-001

3/3/94



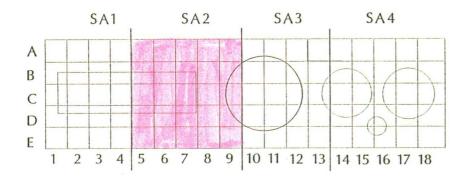
LEGEND

SA1



Sample Area (SA#) With Composite Sample Containing Greater Than Trace Asbestos --N—

MCS Environmental
Roaster Bldg. #5
Bunker Hill Superfund Site
MCS Job No: Date By: BLR
A94-001 3/3/94



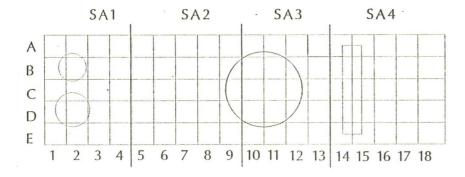
LEGEND

SA1



Sample Area (SA#) With Composite Sample Containing Greater Than Trace Asbestos $\leftarrow N-$

MCS Environmental
Roaster Bldg. #5
Bunker Hill Superfund Site
MCS Job No: Date
A94-001 3/3/94
Page __ of __ FLOOR #4



LEGEND

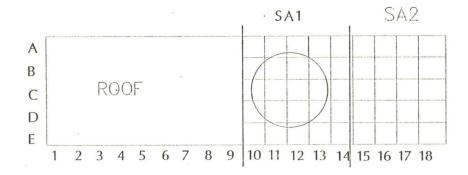
SA1



Sample Area (SA#) With Composite Sample Containing Greater Than Trace Asbestos --N--

MCS Environmental
Roaster Bldg. #5
Bunker Hill Superfund Site
MCS Job No: Date By: BLR
A94-001 3/3/94

Page _ of _ FLOOR #5



RB5 LEGEND SA1



Sample Area (SA#) With Composite Sample Containing Greater Than Trace Asbestos $\leftarrow N-$

MCS Environmental
Roaster Bldg. #5
Bunker Hill Superfund Site
MCS Job No: Date By: BLR
A94-001 3/3/94

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APPENDIX F

CERTIFICATIONS ACCREDITATION
ROASTER FLOOR BUILDING & ROASTER BUILDING #5
BUNKER HILL SUPERFUND SITE, KELLOGG, IDAHO

LIMITED ASBESTOS ASSESSMENT SURVEY OF DUST/DEBRIS

for

ROASTER FLOOR BUILDING & ROASTER BUILDING #5, KELLOGG, IDAHO

MCS Environmental hereby certifies that the Limited Asbestos Assessment Survey of zinc containing dusts/debris, Bunker Hill Superfund Site, Kellogg, Idaho was conducted using the protocol as described within this report. All work and statements contained herein are certified true and correct to the best of MCS Environmental's ability, and using "State of the Art" practices.

$Q \sim 1.4 \times Q$
Inspector: Jonald June Date: 3-8-94
Certificate #:
Issued by: Industrial Lafety & Constitute: 11-19-93
Laboratory Manager: rele Holands Date: 3/7/94
Laboratory Number:(b) (6)
NIST/NVLAP Accreditation Number:

Certificate of Accreditation

MOUNTAIN LABORATORIES MISSOULA, MT

is recognized under the National Voluntary Laboratory Accreditation Program for satisfactory compliance with criteria established in Title 15, Part 7 Code of Federal Regulations.

Accreditation is awarded for specific services, listed on the Scope of Accreditation, for:

BULK ASBESTOS FIBER ANALYSIS

October 1. 1994

Effective until



For the National Institute of Standards and Technology

08/1994

4867287367

ENVIRONMENTAL



ENVIRONMENTAL



Ron Knutson 2104 Reserve. Missoula. MT 59801

has successfully completed the following course approved by the Montana Department of Health and Environmental Sciences

ASBESTOS BUILDING INSPECTOR TRAINING

Refresher Course

For the purpose of accreditation required under section 16.42.308 of the Administrative Rules of Montana and Sections 206 of Title II of the Toxic Substance Control Act (TSCA)

conducted by:

INDUSTRIAL SAFETY & CONSULTING P.O. BOX 9217 HELENA, MT 59604

For the course conducted on November 19, 1993 Location: Helena, Montana Expiration date: November 18, 1994

CERTIFICATE NO









8 Hour Annual Refresher Course

Ronald A. Knutson

has completed the 8 hour HAZWOPER Refresher Course, in accordance with 29 CFR 1910.120, conducted by Safety Consultants, Inc., P.O. Box 4925, Missoula, Montana, 59801, (406) 825-3508, at MCS Environmental, Missoula, Montana Montana.

Location: Missoula, Montana

Refresher Due: February 02, 1995.

February 2nd, 1994 Course Date:

Pete Stanley, President Director of Training:

Social Security #:

(b) (6)

Certificate Number:

(b) (6)